

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Joint Administration Pending)

Ref No: 28

**SUPPLEMENTAL DECLARATION OF BENJAMIN J. STEELE IN SUPPORT OF
DEBTORS' APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING
THE EMPLOYMENT AND RETENTION OF KROLL RESTRUCTURING
ADMINISTRATION LLC AS CLAIMS AND NOTICING AGENT
EFFECTIVE *NUNC PRO TUNC* TO THE PETITION DATE**

I, Benjamin J. Steele, under penalty of perjury, declare as follows:

1. I am a Managing Director of Kroll Restructuring Administration LLC (“Kroll”),² a chapter 11 administrative services firm whose headquarters are located at 55 East 52nd Street, 17th Floor, New York, NY 10055. Except as otherwise noted, I have personal knowledge of the matters set forth herein, and if called and sworn as a witness, I could and would testify competently thereto.

2. On November 17, 2022, I submitted a declaration (the “Initial Steele Declaration”) in connection with the *Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Kroll Restructuring Administration LLC as Claims and Noticing Agent Effective Nunc Pro Tunc to the Petition Date* (the “156 (c) Application”) [Docket No.

¹ The last four digits of FTX Trading Ltd.'s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Effective March 29, 2022, Prime Clerk LLC changed its name to Kroll Restructuring Administration LLC. There has not been any change in the company's leadership, ownership, or organizational structure.

28].³ I hereby incorporate by reference, in its entirety, the Initial Steele Declaration as if fully set forth herein.

3. I hereby supplement the Initial Steele Declaration to disclose the following:

- As a result of its conflicts process, Kroll has been made aware that two of its employees had opened accounts with the Debtors prior to the Petition Date. Such employees did not fund their accounts and are not owed any amounts from the Debtors as of the Petition Date.
- As previously disclosed in the Initial Steele Declaration, Christopher Schepper is a Managing Director of Kroll. Mr. Schepper's wife, Alison Schepper, is a Director at Kroll. Ms. Schepper's father, Paul Tearnen, is a Managing Director at Alvarez & Marsal, which is the Debtors' proposed restructuring advisor. Mr. Tearnen is not a restructuring professional and upon information and belief does not have any involvement in these Chapter 11 Cases. Mr. and Mrs. Scheppers' roles at Kroll are primarily administrative and they do not generally work on any of the firm's cases.

4. Kroll will supplement its disclosure to the Court if any facts or circumstances are discovered that would require such additional disclosure.

5. As set forth in the 156(c) Application, the Debtors have agreed to compensate Kroll for its services in accordance with the Rate Structure set forth in the Engagement Agreement. Kroll hereby discloses that it has agreed to extend to the Debtors a

³ Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the 156(c) Application.

discount of 20% off of the hourly rates set forth in the Rate Structure for the life of the engagement.

6. To the best of my knowledge, Kroll continues to be a “disinterested person” within the meaning of section 101(14) of the Bankruptcy Code and does not hold or represent an interest materially adverse to the Debtors’ estates.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge and belief.

Executed on November 21, 2022

/s/ Benjamin J. Steele
Benjamin J. Steele
Managing Director
Kroll Restructuring Administration LLC
55 East 52nd Street, 17th Floor
New York, NY 10055